

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 23-10831 (MFW)  
)  
) (Jointly Administered)  
)  
)

**NOTICE OF *AMENDED*<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON AUGUST 28, 2023 AT 10:30 A.M. (EDT)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND  
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL  
WILL NOT BE USED TO DIAL IN.**

**PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:**

<https://debuscourts.zoomgov.com/meeting/register/vJltumvqDwqHcl1uAGb7Ujwg7YMgk0rOmtg>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL  
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

**I. MATTERS GOING FORWARD:**

1. Debtors' Motion Under Bankruptcy Rule 9019 for Entry of an Order Approving the Settlement Agreement by and Among the Debtors and Karma Automotive LLC [[Docket No. 248](#); filed August 15, 2023]

Response/Objection Deadline: August 24, 2023 at 4:00 p.m. (EDT)

Responses/Objections Received: Informal comments from the Office of the United States Trustee for the District of Delaware

Related Documents:

- i. Debtors' Motion to Shorten Notice and Objection Periods for "Debtors'

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> Amended agenda items appear in bold.

Motion Under Bankruptcy Rule 9019 for Entry of an Order Approving the Settlement by and Among the Debtors and Karma Automotive LLC” [[Docket No. 249](#); filed August 15, 2023]

- ii. Order Shortening Notice and Objection Periods for Debtors’ “Debtors’ Motion Under Bankruptcy Rule 9019 for Entry of an Order Approving the Settlement by and Among the Debtors and Karma Automotive LLC” [[Docket No. 253](#); entered August 15, 2023]
- iii. Notice of “Debtors’ Motion Under Bankruptcy Rule 9019 for Entry of an Order Approving the Settlement Between Lordstown Motor Corporation and Karma Automotive LLC” and Hearing Thereon [[Docket No. 255](#); filed August 15, 2023]
- iv. **The Official Committee of Unsecured Creditors’ Statement in Support of the Debtors’ Motion to Approve the Settlement Between Lordstown Motors Corporation and Karma Automotive LLC** [[Docket No. 318](#); filed August 24, 2023]
- v. **Declaration of Daniel Ninivaggi in Support of Debtors’ Motion Under Bankruptcy Rule 9019 for Entry of an Order Approving the Settlement Agreement by and Among the Debtors and Karma Automotive LLC** [[Docket No. 322](#); filed August 25, 2023]
- vi. **Certification of Counsel Concerning Order Approving the Settlement Agreement by and Among the Debtors and Karma Automotive LLC** [[Docket No. 325](#); filed August 25, 2023]

Witness Information:

*Debtors’ Witness:*

- i. Daniel Ninivaggi, Executive Chairman of Lordstown Motors Corp., Farmington Hills, Michigan

Status: **On August 25, 2023, the Debtors filed a revised form of order under certification of counsel in connection with this matter. Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions.**

- 2. Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 278](#); filed August 21, 2023]

Response/Objection Deadline: At or before the hearing

Responses/Objections Received: None at this time

Related Documents:

- i. Motion of Hon Hai Precision Industry Co., Ltd., (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC for Entry of an Order Shortening Notice of Motion to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 279](#); filed August 21, 2023]
- ii. Order Shortening Notice of Motion of Hon Hai Precision Industry Co., Ltd., (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 288](#); entered August 22, 2023]

Status: The hearing on this matter will go forward.

**II. CONTESTED MATTER GOING FORWARD:**

3. Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 131](#); filed July 20, 2023]

Response/Objection Deadline: August 21, 2023

Responses/Objections Received:

- A. Debtors' Objection to Foxconn's Motion to Dismiss, or in the Alternative, Convert the Bankruptcy Cases [[Docket No. 281](#); filed August 21, 2023]

Related Documents:

- i. Notice of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 259](#); filed August 15, 2023]
- ii. Order Approving Stipulation Extending Reply Deadline [[Docket No. 275](#); entered August 21, 2023]
- iii. Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 278](#); filed August 21, 2023]

- iv. Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC for Entry of an Order Shortening Notice of Motion to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 279](#); filed August 21, 2023]
- v. Declaration of Jeffrey Finger in Support of Debtors' Objection to Foxconn's Motion [[Docket No. 282](#); filed August 21, 2023]
- vi. Declaration of Daniel Ninivaggi in Support of Debtors' Objection to Foxconn's Motion (SEALED) [Docket No. 283; filed August 21, 2023]
- vii. Declaration of Daniel Ninivaggi in Support of Debtors' Objection to Foxconn's Motion (REDACTED) [[Docket No. 284](#); filed August 21, 2023]
- viii. Declaration of Edward T. Hightower in Support of Debtors' Objection to Foxconn's Motion [[Docket No. 285](#); filed August 21, 2023]
- ix. The Official Committee of Unsecured Creditors' Statement of Position with Respect to Foxconn's Motion to Dismiss or Convert the Bankruptcy Cases [[Docket No. 286](#); filed August 22, 2023]
- x. Order Shortening Notice of Motion of Hon Hai Precision Industry Co., Ltd., (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Approve the Manner of Notice of its Motion to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases [[Docket No. 288](#); entered August 22, 2023]
- xi. **Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Confidential Information in Connection with the Declaration of Daniel Ninivaggi in Support of Debtors' Objection to Foxconn's Motion to Dismiss** [[Docket No. 321](#); filed August 24, 2023]
- xii. **Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc. and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases (SEALED)** [Docket No. 323; filed August 25, 2023]
- xiii. **Declaration of Michael C. Whalen (SEALED)** [Docket No. 324; filed August 25, 2023]

Witness Information:

*Debtors' Witnesses:*

- i. Jeffrey Finger, Managing Director and Co-Head of US Debt Advisory & Restructuring at Jefferies, New York, New York
- ii. Daniel Ninivaggi, Executive Chairman of Lordstown Motors Corp., Farmington Hills, Michigan
- iii. Edward T. Hightower, CEO and President of Lordstown Motors Corp., Farmington Hills, Michigan

Status: The hearing on this matter will go forward on a contested basis.

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Dated: August 25, 2023

Respectfully submitted,

/s/ Jason M. Madron

**RICHARDS, LAYTON & FINGER, P.A.**

Kevin Gross (No. 209)  
Daniel J. DeFranceschi (No. 2732)  
Paul N. Heath (No. 3704)  
Amanda R. Steele (No. 5530)  
Jason M. Madron (No. 4431)  
James F. McCauley (No. 6991)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
gross@rlf.com  
defranceschi@rlf.com  
heath@rlf.com  
steele@rlf.com  
madron@rlf.com  
mccauley@rlf.com

*Proposed Co-Counsel to Debtors and  
Debtors in Possession*

**WHITE & CASE LLP**

Thomas E Lauria (admitted *pro hac vice*)  
Matthew C. Brown (admitted *pro hac vice*)  
Fan B. He (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
tlauria@whitecase.com  
mbrown@whitecase.com  
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)  
111 South Wacker Drive, Suite 5100  
Chicago, IL 60606  
Telephone: (312) 881-5400  
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)  
Doah Kim (admitted *pro hac vice*)  
RJ Szuba (admitted *pro hac vice*)  
555 South Flower Street, Suite 2700  
Los Angeles, CA 90071  
Telephone: (213) 620-7700  
rkampfner@whitecase.com  
doah.kim@whitecase.com  
rj.szuba@whitecase.com

*Co-Counsel to Debtors and  
Debtors in Possession*